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Attorneys for Defendant Epic Systems Corporation

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

CureIS Healthcare, Inc.,

Plaintiff,

v.

Epic Systems Corporation,

Defendant.

Case No.: 3:25-cv-04108-MMC

**DEFENDANT'S RESPONSE TO
PLAINTIFF'S SEALING STATEMENT IN
RESPONSE TO DEFENDANT'S
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED**

Judge: Hon. Maxine M. Chesney

1 Pursuant to Civil Local Rule 79-5(f)(4), Defendant Epic Systems Corporation (“Epic”) files this Response to Plaintiff CureIS Healthcare, Inc.’s (“CureIS”) Sealing Statement In
2 Response to Defendant’s Administrative Motion to Consider Whether Another Party’s Material
3 Should Be Sealed (Dkt. No. 48 (“CureIS Sealing Statement”)).

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5 CureIS’s Sealing Statement is predicated on the same arguments set forth in its
6 Administrative Motion for Leave to File Under Seal Portions of Plaintiff’s Complaint. (*See* Dkt.
7 No. 2 (“First Administrative Motion”).) Accordingly, Epic incorporates by reference the
8 arguments made in its Notice of Motion and Motion to Partially Unseal CureIS’s Complaint.
9 (*See* Dkt. No. 25 (“Motion to Unseal”).) Specifically, the customer-identifying information¹
10 described in CureIS’s Sealing Statement should not be redacted as CureIS has failed to establish
11 compelling reasons supporting redaction, including because (i) CureIS itself affirmatively
12 publicly disclosed the existence of customer relationships for many years on its own website and
13 elsewhere to market its products and services (*id.* at 7-8), and (ii) CureIS has not advanced
14 particularized reasons supported by facts sufficient to meet its burden to justify sealing (*id.* at 8-
15 12). In addition, there is a strong public interest in this matter that would be best served by
16 disclosing the names of the customers at the center of CureIS’s allegations so that the public can
17 assess the veracity of each party’s allegations and arguments (*id.* at 12-13).

18 CureIS’s Sealing Statement should be rejected, and the customer-identifying information
19 presently redacted in Epic’s Reply in Support of its Motion to Partially Unseal CureIS’s
20 Complaint (Dkt. No. 46) should be unsealed.

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¹ As explained in Epic’s Motion to Unseal, Epic does not contest sealing of the names of non-party employees. (Motion to Unseal at 4 n.3.)

1 Dated: August 7, 2025

Respectfully submitted,

2 By: /s/ Lauren A. Moskowitz

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